

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

FIRS HOMEOWNERS ASSOCIATION,

Plaintiff,

v.

CITY OF SEATAC,

Defendant.

No. C19-1130RSL

DECLARATION OF
BRENDAN W. DONCKERS IN
CONSOLIDATED OPPOSITION TO
DEFENDANT'S MOTIONS TO EXCLUDE
EXPERT OPINION TESTIMONY OF
CHERYL L. MARKHAM AND TIM
TROHIMOVICH

Brendan W. Donckers states:

I am counsel for Plaintiff Firs Homeowners Association. I am over the age of 21, have personal knowledge of the facts stated herein and am competent to testify to these facts.

1. Attached as **Exhibit 1** is a true and correct copy of the December 8, 2020 Expert Report of Cheryl L. Markham.

2. Attached as **Exhibit 2** is a true and correct copy of the December 9, 2020 Expert Report of Tim Trohimovich, AICP.

3. SeaTac chose not to depose Cheryl L. Markham or Tim Trohimovich, AICP.

4. Attached as **Exhibit 3** is a true and correct copy of the October 8, 2020 Deposition of Erin Sitterley at page 14.

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IN CONSOLIDATED OPPOSITION TO
DEFENDANT'S MOTIONS TO EXCLUDE
EXPERT OPINION TESTIMONY OF CHERYL L.
MARKHAM AND TIM TROHIMOVICH - 1
(No. C19-1130RSL)

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1000 Second Avenue, Suite 3670
Seattle, Washington 98104 Tel: 206-652-8660

1 5. Attached as **Exhibit 4** is a true and correct copy of the July 23, 2020
2 Deposition of Kathryn Campbell at page 10.

3 6. Attached as **Exhibit 5** is a true and correct copy of the September 9, 2020
4 Deposition of Pamela Fernald at pages 28 – 29.

5 7. Attached as **Exhibit 6** is a true and correct copy of the Curriculum Vitae of
6 Tim Trohimovich, AICP.

7 I declare under the penalty of perjury under the laws of the state of Washington
8 that the foregoing is true and correct.

9 DATED this 15th day of March, 2021, at Seattle, Washington.

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11 s/Brendan W. Donckers
12 Brendan W. Donckers, WSBA #39406
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